

IN THE COURT OF CRIMINAL APPEALS  
OF THE STATE OF TEXAS

PD-00262-20  
PD-00263-20

FILED  
COURT OF CRIMINAL APPEALS  
4/24/2020  
DEANA WILLIAMSON, CLERK

ANDREW TURLEY

v.

THE STATE OF TEXAS

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§  
§  
§  
§

On Petition for Review of  
No. 14-18-00235-CR and  
No. 14-18-00236-CR from  
the Court of Appeals  
Fourteenth District of Texas

**APPELLANT'S MOTION FOR  
EXTENSION OF TIME TO FILE REPLY  
TO PETITION FOR DISCRETIONARY REVIEW**

Appellant, Andrew Turley, moves for an extension of time to file his reply to the State's petition for discretionary review, in the interest of justice.

**TEX. R. APP.P. 10.5(b) statement:**

- (A) Deadline for filing: April 8, 2020
- (B) Length of extension sought: 19 days
- (C) Facts relied on:

In the time since this Court docketed the State's petition on March 24, 2020, Counsel's work has been slowed significantly, due to health issues. The problem likely is a flare-up of a chronic health condition that normally is well-managed by a medication protocol.

This is the time of year when counsel's doctors normally provide check-ups and adjust counsel's medications as needed. These twice-yearly appointments, though, have been postponed due to the current coronavirus pandemic. Therefore, counsel's medications have remained unchanged. As a result, work has been unusually difficult, though it is getting done.

Under these extraordinary circumstances, counsel requests an additional 19 days to complete Appellant's reply to the State's petition.

(D) Number of previous extensions: 0

**Tex. R. App. P. 10.5(c) statement:**

(A) Court of appeals: Fourteenth Court of Appeals (Houston)

(B) Date of court of appeals judgment: March 12, 2020

(C) Case number and style: *Andrew Turley v. State*, Cause Nos. 14-18-00235-CR and 14-18-00236-CR

(D) Motions for rehearing: None.

PRAYER

Appellant respectfully requests this motion be granted and the Court permit him an extension of time until April 27, 2020 to file his reply to the State's petition for discretionary review.

Respectfully submitted,

**ALEXANDER BUNIN**

Chief Public Defender

Harris County Texas

*/s/ Cheri Duncan*

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Attorney for Appellant

**CERTIFICATE OF SERVICE**

I certify that a copy of Appellant's Motion for Leave to File Out-of-Time Reply to Petition for Discretionary Review was served electronically on the Appellate Division of the Harris County District Attorney's Office and the State Prosecuting Attorney on April 23, 2020.

*/s/ Cheri Duncan*

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**CHERI DUNCAN**

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